

**American Lung Association of California
Natural Resources Defense Council
Union of Concerned Scientists**

October 1, 2007

Edie Chang, Chief
Planning and Management Branch, Office of Climate Change
California Air Resources Board
1001 "I" Street
Sacramento, CA 95812

Dear Ms. Chang:

**Re: Scoping Plan Measures -- Medium and Heavy Duty Trucks/Goods
Movement**

We are writing on behalf of the American Lung Association of California, Natural Resources Defense Council, and Union of Concerned Scientists to urge you to consider including several scoping plan measures for the medium and heavy-duty diesel sector. We have submitted emission reduction forms for these items separately, but also felt it was important to call your attention to the importance of these items as a group.

We are pleased that diesel pollution reduction measures became a key component of the early action plan, and urge you to consider several additional measures that couldn't meet the deadlines of the early action process, but should be a key part of the state's longer term AB 32 plan. Diesel pollution reduction measures can achieve the multiple goals of reducing greenhouse gases, expediting progress toward reducing public exposure to diesel exhaust and achieving the Board's goal of 85% reduction in diesel risk by 2020. Pursuing quick adoption and implementation of medium and heavy duty measures would provide immediate health benefits to communities throughout the state by reducing illnesses, hospitalizations, asthma attacks and pre-mature deaths due to diesel exhaust exposure while also contributing to global warming gas reductions and cost savings for engine owners. Furthermore, in addition to reducing standard greenhouse gases, diesel pollution controls also achieve reductions in black carbon, another agent that can speed climate change.

We have put together the following list of practical and available measures to reduce greenhouse gas emissions from medium and heavy-duty vehicles for CARB staff consideration. We appreciate the opportunity to comment and look forward to a continued dialogue as these measures are discussed in the workshop process.

1) Expand and Enhance Anti-Idling Requirements and Enforcement

There are several important opportunities to reduce greenhouse gas emissions through tightening up existing idling regulations and adopting new regulations.

- a) **Enhance Idling Regulation:** Modify the existing regulation on heavy-duty diesel idling to increase greenhouse gas reductions by including standards for use of auxiliary engines and promoting use of electrical power.
- b) **Cargo Handling:** Amend cargo handling equipment regulations to limit idling to a maximum of 3 minutes except for emergency situations or idling necessary to carry out special functions. Thousands of pieces of cargo handling equipment operate at California ports and rail yards, idling much of the time, using roughly one gallon of fuel per hour of idling.
- c) **Enforcement:** We support the inclusion of diesel enforcement as a Group II early action measure and believe CARB's current enforcement program for heavy-duty diesel idling and other diesel control measures must be substantially enhanced in order to ensure criteria pollutant and greenhouse gas reductions required through regulation are achieved in practice. In developing the scoping plan and the early action measures, CARB should include an enforcement component to include: additional dedicated staff to ensure consistent enforcement idling regulations, an outreach program to state and local law enforcement and regional air districts to ensure that these entities undertake idling enforcement duties, and education and outreach efforts directed at truckers and other vehicle and equipment operators covered by the regulations.

2) Promote Medium-Duty Hybrid Technology

CARB should adopt a regulation and incentive program to take advantage of emerging hybrid-electric technology for medium duty delivery trucks. Hybrid electric technology is an excellent option to help significantly reduce greenhouse gas emissions from the transportation sector. While passenger hybrids have been on the market for a few years now, hybrid trucks are just beginning to hit the road in meaningful numbers. A focus by CARB on medium-duty hybrid technology could assist in increasing production volume of this cleaner technology.

Independent testing confirmed significant environmental benefits from FedEx's hybrid-electric medium diesel truck (developed with Environmental Defense) compared to their standard baseline truck including: 75% reduction in smog-causing nitrogen oxides (NOx), 90% reduction in particulate matter and 33% reduction in greenhouse gases emissions.

3) Electrification and Efficiency Improvements of Freight Transportation

Numerous opportunities exist to reduce greenhouse gas emissions from freight transportation sources such as ships, trains, trucks, cargo-handling equipment (cranes, tractors, yard hostlers), airport ground support equipment and tugs in addition to regulations that are already under development at CARB. Opportunities that should be evaluated include:

a) **Electrification of Engines:** Regulations and incentives at ports and airports to promote electrification to replace existing older, dirtier technologies. Regulations and incentive programs could promote use of electrification in trucks, ships, trains and cargo-handling, ground support equipment and plug-in opportunities for airplanes at airport gates.

b) **Efficiency of Movement:** Programs to improve efficiency of freight movement through ports through improvements to cargo transport delivery schedules (enabled through improved computer software). Additionally, more containers could be moved via rail than truck, which would improve efficiency by three times.

c) **Improved and Efficient Design:** Work with other state and federal agencies to promote improved and efficient design of containers, locomotives and ships to reduce greenhouse gas emissions.

d) **Construction Sites:** CARB should also consider requirements for the use of electric power at urban construction sites in lieu of diesel generators where grid supplied electricity is available.

4) **Heavy-Duty Vehicle Speed Reduction**

CARB could achieve significant greenhouse gas reductions by establishing new regulations requiring trucks in California to be equipped with a device to limit maximum speeds. In addition, the California Highway Patrol could improve enforcement of the 55 mph speed limit for trucks. Both measures would work together to reduce vehicle speeds and related greenhouse gas emissions. We also support the proposal for Vessel Speed Reduction for marine vessels in the latest draft of the early action measure document.

On behalf of the undersigned groups, we would appreciate your careful consideration of our suggestions and request that you provide a response regarding the greenhouse gas reductions available from the various suggestions we are forwarding to you, as well as your plans for further action on these ideas. We look forward to working with you on the scoping plan and other AB 32 implementation measures.

Sincerely,

Bonnie Holmes-Gen, American Lung Association
Don Anair, Union of Concerned Scientists
Diane Bailey, Natural Resources Defense Council

cc:

Mary Nichols
Tom Cackette
Chuck Shulock